

Commonwealth of Kentucky
Division for Air Quality
REVISED PERMIT STATEMENT OF BASIS

Conditional Major Permit No. F-05-017R1
MONTEBELLO PACKAGING, INC.
LEBANON, KENTUCKY
December 15, 2007
Frough Sherwani REVIEWER
Plant I.D. # 21-155-00028
AI # 2908
Activity Number # APE20070001

REVISION 1 (MINOR REVISION):

On October 22, 2007, the Division received an application from the source for a minor revision to their conditional major permit F-05-017.

There are five (5) coating lines (EP# 1, 2, 3, 4 and 5) currently operating at the facility. The source is proposing to add one more coating line # 6 (EP # 6).

The new line will have one roll coater for outer coating (F3) and one roll coater for decorative graphic coating (F5). VOC and /HAPs emissions will be controlled by the existing natural gas fired Regenerating Thermal Oxidizer (EP # 7).

The current source wide emission allowable for VOC is 90 tons per rolling 12-month period, 9.0 and 22.5 tons per rolling 12-month period for a single and combined HAPs respectively. These allowables will remain the same.

SOURCE DESCRIPTION:

Montebello makes flexible aluminum tubes for pharmaceuticals and toothpaste. Aluminum disks are extruded to form tubes. Coatings are applied inside and outside. Inside coatings are sprayed, outside coatings are applied by roll coating. Coatings are solvent based.

COMMENTS:

On March 31, 2005 the source has applied to the Division for Air Quality for the renewal of their conditional major permit F-00-012 (Revision 1). Since the last permit modification dated April 16, 2003 there has been

- a. No changes in process output
- b. No deleted equipment
- c. No changes in equipments
- d. No changes to process rates

Type of control, enclosure, and efficiencies:

<ul style="list-style-type: none">• Control Equipment Destruction Efficiency Capture Efficiency	Regenerating Thermal Oxidizer (RTO) 98.6% tested on May 25, 2005 98.1% tested on May 25, 2005
<ul style="list-style-type: none">• Control Equipment Estimated Control Efficiency	Panel Filters 95 %

Applicable regulation:

- a. **401 KAR 59:010**, New Process Operations (applicable to each affected facility associated with a process operation commenced on or after July 2, 1975);
- b. **401 KAR 63:020**; Potentially hazardous matter or toxic substances, applicable to each affected facility which emits or may emit potentially hazardous matter or toxic substances.
- c. **401 KAR 52:030**. Federally-enforceable permits for nonmajor sources.

Precluded regulation:

401 KAR 59:225 Miscellaneous metal parts coating, does not apply because the permittee has taken limits on emissions to avoid triggering major source thresholds, and the source is located in an attainment county for ozone.

EMISSION AND OPERATING CAPS DESCRIPTION:

1. The source has accepted a facility-wide cap on annual VOC emissions of no more than 90 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
2. The source has accepted a facility-wide cap on annual individual HAP emission of no more than 9.0 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
3. The source has accepted a facility-wide cap on annual combined HAPS emissions of no more than 22.5 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.